

EXHIBIT 2

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August 23, 2018

Via Electronic Mail

Brian Ross, Esq.
Gibbs & Bruns LLP
1100 Louisiana
Suite 5300
Houston, TX 77002

Britt M. Miller, Esq.
Mayer Brown
71 South Wacker Drive
Chicago, IL 60606

Re: *In re Dealer Management Systems Antitrust Litigation*, MDL No. 2817

Dear Britt and Brian:

Accompanying this correspondence are deposition notices for the following witnesses:

Reynolds

1. Agan, Dan
2. Bates, Dave
3. Boughan, Tim
4. Braun, Michael
5. Brockman, Robert
6. Burnett, Robert
7. Edwards, Kasi
8. Farley, Will
9. Grabill, Chris
10. Hahn, Michael

11. Hall, Kelly
12. Hellyer, Chris
13. Hill, Keith
14. Kaser, Eric
15. Lamb, Ronald
16. Martin, Jamie
17. Martin, Jon
18. Maurer, Joel
19. Rahill, Tim
20. Roadhouse, Dan

21. Rulon, Christopher
22. Schaefer, Robert
23. Schwartz, Thomas
24. Sidwell, Peter
25. Strawsburg, Jon
26. Thornhill, Ed
27. Wenclewicz, Barbara
28. Wonderly, Jeff

CDK

1. Anenen, Steven
2. Ayotte, Elizabeth

3. Barr, Jeffrey
4. Bihner, Joe

5. Conver, Leigh Ann
6. Crutchfield, Dean

7. Distelhorst, Kevin
8. Douglas, Josh
9. Foote, Jim
10. French, Steven
11. Frey, Ron
12. Gardner, Howard
13. Gerlich, Trey
14. Guentzel, Michael
15. Herbers, Scott

16. Imowitz, Mark
17. Joza, Mike
18. Karp, Robert
19. Lilly, John
20. MacDonald, Brian
21. Marvin, Robert
22. McCray, Dan
23. Morris, Chris
24. Neitzel, Al

25. Noser, Michael
26. Nosick, Jeff
27. Roman, Mark
28. Thorne, Malcom
29. Traucht, Jesse
30. Workman, Ron
31. Wrobel, David

Please note that the date, time, and locations are placeholders only. We will of course work with you to find mutually agreeable times and locations, but we believe it is important to start calendaring these now. Several of these depositions will also require two or possibly three days. It is therefore necessary to confer on the duration and scheduling for those longer depositions.

We also need to calendar these depositions to ensure their proper sequencing. To that end, the witnesses highlighted in blue, we would like to take in the October-November timeframe (Wave 1); the witnesses highlighted in yellow, we would like to take in December (Wave 2); and the witnesses highlighted in gray, we would like to take in the January-February timeframe (Wave 3).

In terms of sequencing the productions of these witnesses' custodial files before the October 12, 2018, document production deadline, we ask that you produce the documents for the Wave 1 deponents first, for the Wave 2 deponents next, and then followed by the deponents for Wave 3. All documents, of course, must be produced by the October 12th deadline.

In addition to the attached deposition notices, MDL Plaintiffs will also serve Rule 30(b)(6) deposition notices on each Defendant.

Finally, several of these witnesses are former employees of CDK or Reynolds. Please let us know if you plan on representing these witnesses, or if we can contact them directly.

We request a meet and confer for tomorrow (Friday) at 1:00 p.m. to discuss these issues. Please let us know if you are available at that time. If not, please propose a different time for Friday.

We look forward to working with you to make this next phase of discovery – the deposition phase – as efficient as possible for all parties.

Very truly yours,

s/ Derek T. Ho

Derek T. Ho

s/ Peggy J. Wedgworth

Peggy J. Wedgworth